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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

11	TIM TOTTH,	)	Case No. 2:13-cv-00225-MMD-VCF
12		)	
13	Plaintiff,	)	DEFENDANT NCO FINANCIAL
14		)	SYSTEMS, INC.'S UNOPPOSED
15	vs.	)	MOTION FOR EXTENSION OF TIME
16		)	TO RESPOND TO COMPLAINT
17	NCO FINANCIAL SYSTEMS, INC., and	)	
18	DOES 1-10, inclusive,	)	
19		)	
20	Defendant.	)	

**DEFENDANT NCO FINANCIAL SYSTEMS, INC.'S UNOPPOSED MOTION  
FOR EXTENSION OF TIME TO RESPOND TO COMPLAINT**

21 Defendant, NCO Financial Systems, Inc. (NCO), through counsel and under the  
22 Federal Rules of Civil procedure, files this Unopposed Motion for an Extension of Time  
23 to Respond to Complaint, and states:

24 1. On February 26, 2013, Plaintiff, Tim Toth (Plaintiff), served his complaint  
25 and summons on NCO. NCO's responsive pleading is due on March 18, 2013.

26 2. Undersigned counsel, however, requests additional time to review the file  
27 materials, conduct an investigation and confer with her client in order to draft an  
28 appropriate responsive pleading. In addition, the extension will allow the parties the time


1 necessary to engage in meaningful and good-faith settlement negotiations in hopes the  
2 parties can reach a mutually agreeable resolution without the Court's involvement.

3 3. Plaintiff, through counsel, has agreed to allow NCO an extension of time  
4 through and including April 2, 2013 to respond to the complaint.

5 WHEREFORE, Defendant, NCO Financial Systems, Inc., respectfully requests  
6 this Court grant it an extension through and including April 2, 2013, to respond to the  
7 complaint, and for such other relief as this Court deems proper.

8 Respectfully submitted,

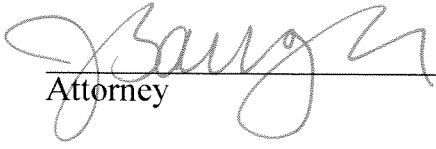
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20 NCO FINANCIAL SYSTEMS, INC.

21 **CERTIFICATE OF SERVICE**

22 I certify that on this 18<sup>th</sup> day of March, 2013, a copy of the foregoing was filed  
23 electronically in the ECF system. Notice of this filing will be sent to the parties of record  
24 by operation of the Court's electronic filing system, including Plaintiff's counsel as  
25 described below. Parties may access this filing through the Court's system.

26 George Haines, Esq.  
27 Haines & Krieger, LLC  
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Las Vegas, NV 89130

  
Attorney

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